

Title: Regulatory Compliance update

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1. Background

- 1.1. This report is to bring the Leeds Housing Board up to date with the steps that are being taken by the Council to meet the requirements of the new regulatory regime that has been introduced by the 2023 Social Housing (Regulation) Act.
- 1.2. The new regulatory regime has given the Regulator for Social Housing (RSH) increased powers to regulate social housing providers, and how preparation for them to inspect our services is being carried out.

2. The Social Housing Regulation Project Board

- 2.1. Following several months preparatory work, in January 2024 a Project Brief was accepted, establishing the Social Housing Regulations Project, along with the Social Housing Project Board.
- 2.2. The aim of the project is to co-ordinate the Council's response to the regulatory regime and to ensure we meet all the requirements of the regulator as they develop. The Social Housing (Regulation) Act has put in place many changes, but some aspects of the new regulatory regime are still in development.
- 2.3. The Board is chaired by the Chief Officer Housing and is attended by a wide range of senior officers who are leading on work to ensure robust regulatory compliance. The Board meets on a monthly basis and receives updates on the various workstreams which make up the project and takes any decisions that the project seeks in order to progress.
- 2.4. The Project has been divided into four 'Work Packages', which each focus on a different aspect of the new regulations and how we meet them in Leeds.
- 2.5. The Work Packages are:
 - **Work Package 1 – Tenant Engagement:** A key aim of the new regulations is to empower tenants via sharing more information with them so they can scrutinise us more effectively and to give them a greater say in decision making. The purpose of this work package is to support the development of a new Resident Engagement Strategy, to ensure that a culture of listening and responding to the tenant voice is embedded across the service, ensure clear communications plans are in

place to support the delivery of major projects such as Damp & Mould, REEMAs, the High Risk Residential Building work and the Marmot City project.

- **Work Package 2 – Governance:** This Work Package works on ensuring a robust governance structure that will allow us to be able to effectively scrutinise our performance as the new regime requires. It will look at how the Leeds Housing Board is performing and if any improvements can be made, will support the development of a performance and quality management framework so accurate data is being provided to elected members and the Leeds Housing Board. That we meet the requirement for a designated Health & Safety lead and meet the recommendations in the Housing Ombudsman’s ‘Spotlight’ reports.
- **Work Package 3 – Consumer Standards:** This work package has overseen and co-ordinated the work done so far on the Consumer Standards that is explored in detail in the previous report. It is also concerned with ensuring we meet the requirements of the Tenant Satisfaction Measures, which the Leeds Housing Board has been kept briefed on throughout the year.
- **Work Package 4 – Project Management:** This work package is concerned with the running and administration of the project itself.

3. **Other Key Areas of Work**

- 3.1. Whilst regular reports have been provided to Board around TSM reporting, complaints management and Consumer Standard compliance there are some other key pieces of work which are underway to support robust compliance with the regulatory standards. these are outlines below.

Proposed Competency and Conduct Standard

- 3.2. Between February and April this year the government ran a consultation on proposals to introduce a new Competence and Conduct Standard from April 2025, which, if introduced, will require all social landlords to have a written policy setting out their approach to managing and developing skills, knowledge, experience and conduct of staff. It will also require that all senior managers and senior executives hold, or be working towards, a ‘relevant housing qualification’ – depending on seniority either a level 4 or 5 housing qualification.
- 3.3. Housing Leeds is currently undertaking an exercise to consider which roles may be in scope for the new qualification requirement and which staff in those roles currently have the required qualification. Some staff have the required qualification, others are deemed to be partially qualified, i.e. they have a qualification in a related discipline and so need to undertake some modules in order to be fully qualified. Where staff are not qualified they will be required to have started working towards the qualification requirement within 2 years. A number of staff are quite anxious about the

proposed introduction of this new requirement and so we have developed some FAQs and are offering 121 support to affected staff.

- 3.4. We are already partnered with a training provider to deliver level 4 and 5 Housing apprenticeships. Where staff are keen to progress with the working towards the required qualification now we are supporting them to do so and have a number of staff who have recently started progressing towards the qualification, or are due to start later in the year.

Regulatory Related Processes

- 3.5. It is important that consideration is given to how we respond to new regulatory requirements which could be required at any point, such as how we consider any new areas of potential non compliance with the Consumer Standards and self referral and also how we respond when notified of an inspection and preparations for that inspection.
- 3.6. Process maps along with checklists have been produced to guide how we respond to these new regulatory requirements.

Ombudsman Spotlight Reports

- 3.7. The Housing Ombudsman Service has published a series of 'Spotlight reports' - covering issues where the Ombudsman tends to see a large amount of casework, investigating themes to complaints issues and setting out learning recommendations for landlords. Full details of the published spotlight reports are available [here](#) including on damp and mould, noise, knowledge and information management and attitudes, respect and rights.
- 3.8. For each of these spotlight reports Housing Leeds has undertaken a self assessment against the recommendations and developed action plans to strengthen our approach as follows:
- Damp and mould – to ensure that more rigorous arrangements are in place for the reporting of damp and mould, training for staff and information available for residents.
 - Noise - to ensure that noise is considered as part of void, allocation, and investment to minimise impacts and information is available for residents / processes are robust around noise management.
 - Knowledge and information management – to ensure that there is robust management of data about homes, residents and customer contact so that customers receive a high quality customer service.
 - Attitudes, respect and rights – to ensure that services are customer focused and give appropriate consideration to a tenant's vulnerability and effectively manage complaints.
- 3.9. There is quite a bit of crossover between recommendations in the spotlight reports and the Consumer Standards expectations, so where appropriate actions are being as part of Consumer Standard actions.

Raising Awareness of Regulatory Arrangements

- 3.10. With such significant changes to regulatory arrangements which require cultural change it is really important that we raise awareness of the regulatory changes and their importance, and to share how we are working to strengthen our compliance with regulatory arrangements.
- 3.11. An E-learning package is being developed which will explain to staff at all levels what the new regulations require, why they are being implemented and the responsibilities each member of staff has under the new regulations. The E-learning will be completed as a mixture of team and individual learning as bite-size learning up to the end of October.
- 3.12. The E-learning package can also be used to raise awareness with Tenant Scrutiny Board and the Tenant Voice Panel, so that involved tenants also have an understanding of regulatory changes and actions underway. Sessions are planned with the Tenant Scrutiny Board to deliver this training.
- 3.13. Presentations have been made on the regulatory changes to Elected Members via Leader Management Team and the Environment, Housing and Communities Scrutiny Board. The E-learning material can support any additional requests from Members for more information.
- 3.14. We have started to raise awareness of the new regulatory changes with other Council services / other organisations who provide services to tenants. Meetings will be planned with all Council services and main contractors over the coming months to further raise awareness and outline any changes required around service level arrangements, service standards and resident communications.

Review of Governance Arrangements

- 3.15. Under the new regulatory requirements there is a continued focus on 'co-regulation'. This means that Boards and Councillors are responsible for ensuring that organisations are managed effectively and that they deliver outcomes to the RSH's standards. The RSH will seek assurance that robust governance arrangements are in place to ensure that there is a genuine opportunity for tenants to influence services at an operational and strategic level and that there is appropriate check and challenge of service quality and regulatory compliance.
- 3.16. Leeds City Council established the Leeds Housing Board in June 2024, with representation from Elected Members and Tenants, and this Board has overseen our preparations for strengthened regulation. There are also wider governance arrangements relating to the delivery of Council housing services, with regular reports to the Environment, Housing and Scrutiny Board and Executive Board, and the Tenant Scrutiny Board also has a role in scrutinising our compliance with standards.
- 3.17. A review is planned of our governance arrangements to evaluate if arrangements are sufficiently robust and to identify opportunities for improvement. It is proposed that the review will consider the following:
 - Leeds Housing Board (LHB) – review of its role, terms of reference, strengths and weaknesses and opportunities for improvement.

- The formal reporting arrangements between the LHB and other Boards – Scrutiny Board, Executive Board, Tenant Scrutiny Board to ensure that there are clear lines of accountability.
 - Compare with arrangements in place in other large local authorities to identify any possible areas of best practice.
- 3.18. As part of the review we are keen to provide an opportunity for feedback from all LHB members and supporting officers – we are proposing to offer a meeting with tenant representatives and 121 meetings with other Board members during August / September. We aim to conclude the review and report the findings to the next Board meeting covering Council Housing Operations in November.
- 3.19. Where landlord services are provided by other organisations it is important that we consider what governance and assurance arrangements are in place so that the Council is assured that services provided by the organisation are provided robustly in line with regulatory standards. The review of governance arrangements will give consideration to contractual arrangements in place with organisations along with performance management and assurance arrangements.

4. Recommendations

- 4.1. The Leeds Housing Board is asked to note and comment on the information outlined above.
- 4.2. In particular the Board is asked comment on the proposed scope of the review of governance arrangements linked to regulatory compliance.